

David Scott Easom  
1/17/2023

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SCOTT EASOM, ADRIAN HOWARD,	§	
and JOHN NAU, on behalf of	§	
themselves and on behalf of	§	
all others similarly situated,	§	
Plaintiffs,	§	CIVIL ACTION NO.
	§	4:20-CV-02995
V.	§	
	§	
US WELL SERVICES, LLC,	§	
Defendant.	§	

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ORAL DEPOSITION OF DAVID SCOTT EASOM

JANUARY 17, 2023

VOLUME 1 OF 1

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ORAL DEPOSITION OF DAVID SCOTT EASOM, produced at the instance of Defendant and duly sworn, was taken in the above-styled and numbered cause on the 17th day of January, 2023, from 12:32 p.m. until 4:22 p.m., before Carol S. Temperton, CSR, in and for the State of Texas, reported by stenograph machine, at the offices of McDonald Worley, P.C., 1770 St. James Place, Suite 420, Houston, Harris County, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record.

David Scott Easom  
1/17/2023

15

1           A    Both, actually, because the shop that was  
2   there was in Bryan; and that was the main base was the  
3   Bryan facility, for me.

4           Q    And how far away did you actually live, like  
5   your home, from the Bryan main base facility?

6           A    It's probably 15 miles.

7           Q    Okay. And then how far away were the pads?  
8   And by the way, when we say pad, when you say pad, is  
9   the pad where you're actually doing the fracking?

10          A    Yes.

11          Q    Is the pad a customer's site?

12          A    Yes. It's a -- so we'll say it's either  
13   customer site for Wild Horse or Apache, or I forgot who  
14   bought out Wild Horse. The place up in Oklahoma. I  
15   cannot think of the name of that company. But those  
16   pads are leases owned by those companies. The  
17   property, per se, belongs to somebody else.

18          Q    Always or most of the time?

19          A    Yes. Those properties belong to either large  
20   farms or somebody else. They aren't particularly owned  
21   by the oil company themselves. They are, say, a  
22   100-year lease by the oil company; but those mineral  
23   rights belong to whoever owns that land or whoever  
24   previously owned that land. You know, those -- you  
25   know, that stuff doesn't necessarily belong to the oil

David Scott Easom  
1/17/2023

118

1 location.

2 Q If it was the San Angelo location, would you  
3 have been in a hotel or a man camp?

4 A A man camp.

5 Q The next paragraph says, "Each of defendant's  
6 facilities, including the Bryan, Texas location, the  
7 Jane Lew, West Virginia location that served as the  
8 base of operations from which I was dispatched to do  
9 work were independently large enough to be covered by  
10 the WARN Act because defendant had over 100 employees  
11 at each location."

12 How do you know that they had over 100  
13 employees in each location?

14 THE WITNESS: Do you want me to answer  
15 that?

16 A Okay. Just based off --

17 MR. YEZIERSKI: To the best of your  
18 ability, yeah.

19 A Okay. So I know the Bryan, Pleasanton, and  
20 San -- or Bryan, Pleasanton, San Angelo, yeah, all  
21 three of those have over 100 employees. The Jane Lew,  
22 not really sure how many employees they got. They have  
23 a lot, but I don't know the exact number at those.

24 Q (BY MR. KORN) Okay. Paragraph 16 says, "If I  
25 had received advance notice of the mass layoff that

David Scott Easom  
1/17/2023

120

1 A Yes, sir.

2 Q It then says, "I" -- this is number 17, third  
3 sentence, "I was informed that I, along with numerous  
4 other employees, were being let go effective  
5 immediately."

6 Who were you referring to in that  
7 conversation with --

8 A The other four employees that were electronic  
9 technicians.

10 Q And I can't recall if I asked you, were those  
11 technicians on different fleets?

12 MR. YEZIERSKI: For the record, objection  
13 to form. You have asked that already.

14 But you feel free to answer it again if  
15 you want.

16 A Yeah, I'm going to say yes, it's other fleets,  
17 so yeah.

18 Q (BY MR. KORN) It says -- number 18 says, "To  
19 my knowledge, most, if not all, of the Similarly  
20 Situated Employees were terminated in a similar manner  
21 and at approximately the same time." You don't have  
22 knowledge of that, other than the handful of people  
23 that you talked to when you went to return your stuff,  
24 right? Other than those people, you don't have  
25 knowledge of that, do you?

David Scott Eason  
1/17/2023

121

1           A    Yeah. As far as -- so I guess on that  
2 statement, it would be the other four electronic  
3 technicians that were terminated at the same time as  
4 me. And then as returning my equipment back to the  
5 company, talking to those other employees, learning  
6 that they had been terminated at the same time. So  
7 that would be -- I guess that's a correct statement as  
8 far as that goes.

9           Q    Can you turn to Exhibit 14?

10          A    Okay.

11          Q    I'm going to take a very short break.

12          A    All right.

13          Q    Very short.

14               (Brief recess from 3:56 p.m. to 3:59 p.m.)

15          Q    (BY MR. KORN) Okay. We're now in Exhibit 14,  
16 Plaintiff's Responses to Defendant's First Set of  
17 Interrogatories. And if you turn to the second page --  
18 I'm going to be kind of jumping around through this  
19 real quick. But this attributes you to saying certain  
20 people might have knowledge of information. Some of  
21 them you've already said, so I'm going to go through it  
22 real quick. Other people I'm going to be, like, "Who  
23 are they?" just to kind of get a quick response.

24                       Paul Ralph Seagers, that's the supervisor  
25 guy, right?